Federal Defenders
OF NEW YORK, INC.

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

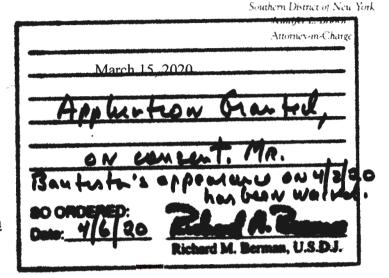David E. Patton
Executive Director
and Attorney-in-Chief

Southern District of New York

Jennifer L. Brown
Attorney-in-Charge

March 15, 2020

Application Granted, on consent. Mr. Bautista's appearance on 4/3/20 has been waived.

SO ORDERED:
Date: 4/6/20
Richard M. Berman, U.S.D.J.

BY ECF

The Honorable Judge Richard M. Berman
United States District Courthouse
500 Pearl Street
New York, NY 10007

Re: **United States v. Leonardo Bautista**
      20 Cr. 14 (RMB)

Dear Judge Berman:

I write to respectfully request that Mr. Bautista's bail conditions be modified to replace the condition of home detention with a curfew set at the discretion of Pretrial Services and enforced by location monitoring. The Government and Pretrial Services consent to this request.

On December 6, 2019, the following bail conditions were imposed by Magistrate Judge Moses, *inter alia*: $75,000 personal recognizance bond co-signed by three financially responsible persons; travel limited to SDNY/EDNY/DNJ; home detention with electronic monitoring; surrender travel documents (and no new applications); continue or seek employment; Pretrial Supervision as directed by PTS.

In the past three months since his release on bail, Mr. Bautista has been fully compliant with his bail conditions and the Pretrial Services schedule that permits him to leave his house to drop off and pick up his children from school. Mr. Bautista recently secured a job opportunity, where his shift will run from 6:30 a.m. to 4:00 p.m. in the District of New Jersey. By modifying the condition of home detention, and granting Pretrial Services with oversight over the curfew schedule, Mr. Bautista will be afforded the opportunity to better support himself and his family financially. As noted, both the Government and Pretrial Services consent to this request.

Thank you for your consideration of this request.

Respectfully submitted,
/s/
Emmanuel Fashakin, Jr.
Assistant Federal Defender
(212) 417-8727

cc: AUSA Matthew Hellman (by ECF)
      PTSO Joshua Rothman (by e-mail)